## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

GERALD CASH, et al., Case No. 1:01cv753

> Plaintiffs, (Judge Beckwith)

JOINT MOTION TO EXTEND V.

DISCOVERY CUTOFF

HAMILTON COUNTY DEPT.

OF ADULT PROBATION,

Defendants.

Now come the parties in the above-styled action and respectfully request this Court to extend the discovery cutoff in this case until June 30, 2006. The reasons why this motion should be granted are set forth in the accompanying memorandum.

# Respectfully submitted,

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### MEMORANDUM

The County has recently disclosed, pursuant to Plaintiffs' discovery requests, some additional names of persons who might have evidence in this case. The City also wishes to take another deposition. An extension of the discovery cutoff date until June 30, 2006, should not prejudice the trial date of October 3, 2006.

#### **CONCLUSION**

For the foregoing reasons, the Joint Motion to Extend Discovery Cutoff should be granted.

### Respectfully submitted,

/s/ Stephen R. Felson

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